

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address	FOR COURT USE ONLY
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<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Creditor Henrik Agasyan	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: SILVA AGASYAN	CASE NO.: 2:22-bk-16660-NB CHAPTER: 7
	NOTICE OF OPPOSITION AND REQUEST FOR A HEARING
	Debtor(s).

1. TO (specify name): CHAPTER 7 TRUSTEE, JOHN MECHACA & COUNSEL OF RECORD, WESLEY AVERY
2. NOTICE IS HEREBY GIVEN that HENRIK AGASYAN, a creditor of the bankruptcy estate and _____, a party in interest, hereby opposes the following request (specify that which is opposed):
On or about 1/4/23, the trustee caused to be filed a notice of application to employ a real estate broker to sell the former residence of the Debtor and the objecting party herein, Henrik Agasyan who is the Debtor's ex-husband. Mr. Agasyan opposes the Trustee's request to employ the real estate broker and requests a hearing on the matter.
3. This opposition is based upon the following grounds (specify grounds):
(1) The subject property has effectively been sold at \$2.65M on an all cash basis and the only outstanding act to conclude the sale is to record the fully executed grant deed. All funds are in escrow waiting for disbursement, which will happen when the deed is recorded. There is no actual or necessary work to be done. (2) Claremont Capital, Inc. does not have the necessary qualifications to be the broker of record to sell the subject property. (3) The state court has issued two orders taking away from the Debtor any rights to market or sell the subject property. (4) The real estate broker who has been working on selling the property, Raz Zadarian, has effectively sold the property three times and should continue to be the broker on any sale; a new broker would not be effective or necessary. Please see attached declarations for further support.

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. Attached hereto are the following documents in support of this opposition which are admissible under the Federal Rules of Evidence (*specify declarations and exhibits by name or description*):
Declaration of Raz Zadorian, current real estate broker on the subject property of the estate.
- Exhibit "1" - True and correct copy of the DocuSign Certificate of Completion showing that the Debtor completed signing all documents relevant to the December 2022 Sale on 12/06/2022 at 10:13:39AM, namely the grant deed and the amended escrow instructions.
- Exhibit "2" - True and correct copies of Mr. Juarez's real estate listings and Yelp reviews that the declarant discovered on the internet on or about January 17, 2023.
Declaration of Donald Schweitzer, counsel for Henrik Agasyan in state court proceeding regarding dissolution of Henrik and Silva Agasyan's marriage.
- Exhibit "A" - True and correct copy of the May 6, 2022 Minute Order of the Los Angeles Superior Court, Department 84.
- Exhibit "B" - True and correct copy of the July 20, 2022, Minute Order of the Los Angeles Superior Court, Department 84 and the Findings and Order after Hearing, dated July 20, 2022.
- Exhibit "C" - True and correct copy of the August 17, 2022, Minute Order of the Los Angeles Superior Court, D Department 84 and the Court's ex-parte orders, dated August 17, 2022
- Exhibit "D" - True and correct copy of the September 22, 2022, 2022 Minute Order of the Los Angeles Superior Court, Department 84
- Exhibit "E" - True and correct copy of the November 1, 2022, 2022 Minute Order of the Los Angeles Superior Court, Department 84
5. (Optional) Attached hereto is a Memorandum of Points and Authorities upon which opposing party will rely.
6. Total number of attached pages of supporting documentation: 47 (a total of 51 pages)

Any reply to this opposition must be filed with the court and served on this opposing party not later than 7 days prior to the hearing on the motion.

WHEREFORE, the undersigned prays that this court deny the subject request and set this matter for a hearing.

Date: 01/18/2023

Respectfully submitted,

The Rojhani Law Group
Printed name of law firm

s/ Selena Rojhani
Signature

Selena Rojhani
Printed name

Attorney for: Henrik Agasyan, Creditor

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
120 El Camino Drive, #116, Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled: **Notice of Opposition and Request for a Hearing** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 01/18/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 01/18/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Neil W. Bason
US Bankruptcy Court
225 E. Temple Street, Suite 1552
Los Angeles, CA 90012

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

01/18/2023 Selena Rojhani
Date Printed Name

s/ Selena Rojhani
Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Case Name:Silva Agasyan
Case Number:2:22-bk-16660-NB

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Courtesy copy emailed by Rojhani Law Group to counsel for Schweitzer Law
Partners, Inc. - Leslie.Horowitz@offitkurman.com